III.   REMARKS/ARGUMENTS

The Applicants thank the Examiner for the Examiner's examination of the present application. By way of summary, Claims 1-20 and 43-58 were previously pending. Claims 1-20, 43, 46-47, 49, and 53-58 have been amended. Claims 44-45, 48, and 50-52 remain as previously presented. Accordingly, Claims 1-20 and 43-58 remain pending for consideration. In response to the Office Action, Applicants respectfully request the Examiner to reconsider the above-captioned application in view of the amendments set forth and the following arguments.

A.   Discussion of Claim Objections Under 37 C.F.R. § 1.75(c)

Claim 43 stands objected to under 37 C.F.R. § 1.75(c) as being in improper dependent form. Claim 43 has been amended without altering its scope in order to place the claim in proper format. This claim amendment is not made for patentability purposes, and it is believed that the claim would satisfy the statutory requirements for patentability without the entry of such amendment. Accordingly, Applicants respectfully submit that Claim 43 is now in proper format, and Applicants respectfully request that the objection of Claim 43 under 37 C.F.R. § 1.75(c) be withdrawn.

B.   Discussion of Claim Rejections Under 35 U.S.C. § 112

The Office Action rejected Claims 49-51 under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Applicants respectfully disagree with the Examiner's rejection and respectfully traverses this rejection because Claims 49-51 are enabled as set forth below.

1.   Claim 49

As to Claim 49, the Examiner states that Applicants "fail[] to disclose the claimed 'a third' and a 'fourth' storage modules" and "did not specify any link between the claimed third and fourth storage modules." The Examiner then argues that "as such, the specification is not enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention."

Applicants respectfully disagree with the Examiner's assertions. For example, a set of four storage units is disclosed in Figure 1 as Smart Storage Unit 0, Smart Storage Unit 1, Smart Storage Unit 2, and Smart Storage Unit 3. Moreover, the four storage units shown in Figure 1 are in communication with each other as shown by the connecting lines. In addition, the application discloses in Paragraph 0111 that "[i]n one embodiment, the smart storage units 114

may be connected to and/or communicate with the other smart storage devices 114 in the intelligent distributed file system 110 via the remote block managers 337" and in Paragraph 0112 that "[t]he remote block manager modules 337 may enable the smart storage units 114 to talk to each other via a connection such as TCP." The citations to the application are exemplary citations to various disclosed embodiments and are not meant to limit and/or narrow the scope of the claims in any way.

Accordingly, Applicants respectfully submit that Claim 49 is enabled and does comply with 35 U.S.C. § 112, first paragraph, and Applicants respectfully request the Examiner to withdraw the rejection of Claim 49 under 35 U.S.C. § 112, first paragraph, and to pass Claim 49 to allowance.

2. Claims 50-51

Claims 50-51 depend from Claim 49 and include all of the limitations of Claim 49. Accordingly, Applicants respectfully submit that Claims 50-51 are enabled and comply with 35 U.S.C. § 112, first paragraph, for the reasons as set forth above with respect to Claim 49. Thus, Applicants respectfully request the Examiner to withdraw the rejection of Claims 50-51 under 35 U.S.C. § 112, first paragraph, and to pass Claims 50-51 to allowance.

C. Discussion of Claim Rejections Under 35 U.S.C. § 102

The Office Action rejected Claims 1-2, 5-10, 13-20, 43-46, 54-56, and 58 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,403,639, issued to Belsan et al. ("Belsan"). Applicants respectfully disagree with the Examiner's rejections and respectfully traverse this rejection because Belsan fails to identically teach every element of Claims 1-2, 5-10, 13-20, 43-46, 54-56, and 58. *See* M.P.E.P. § 2131 (stating that in order to anticipate a claim, a prior art reference must identically teach every element of the claim).

Although Applicants submit that Belsan does not disclose each and every element of the claims rejected under Belsan, Claims 1-2, 5-10, 13-20, 43, 46, 54-56, and 58 have been amended without altering their scope in order to clarify the features of the Applicants' inventions. These claim amendments are not made for patentability purposes, and it is believed that the claims would satisfy the statutory requirements for patentability without the entry of such amendments. Accordingly, Applicants respectfully submit that Belsan fails to teach or suggest every element of Claims 1-2, 5-10, 13-20, 43-46, 54-56, and 58, and Applicants respectfully request the Examiner

to withdraw the rejection of Claims 1-2, 5-10, 13-20, 43-46, 54-56, and 58 under 35 U.S.C. § 102(b) and to pass Claims 1-2, 5-10, 13-20, 43-46, 54-56, and 58 to allowance.

1. Claims 1-2, 5-10, and 43

a. Claim 1

Applicants respectfully submit that Belsan fails to teach or suggest every element of amended Claim 1. For example, amended Claim 1 includes "a first program module stored in said distributed file storage system and in communication with the set of storage modules configured to: dynamically select from the set of storage modules a first storage module on which to store the first file portion; dynamically select from the set of storage modules a second storage module on which to store the second file portion, wherein the first storage module is different from the second storage module; dynamically select from the set of storage modules a third storage module on which to store at least a portion of the metadata, wherein the third storage module is different from the first storage module and the second storage module; and dynamically select from the set of storage modules a fourth storage module on which to store the first error correction data, wherein the fourth storage module is different from the first storage module and the second storage module," which is not disclosed in Belsan. Thus, Applicants respectfully submit that Claim 1 is patentably distinguished over the cited reference. Applicants respectfully request the Examiner to withdraw the rejection of Claim 1 under 35 U.S.C. § 102(b) and to pass Claim 1 to allowance.

In addition, Applicants submit that support for amended Claim 1 is found throughout the application. The following provides a sample of the support as found in one of the disclosed embodiments. The following, however is meant as an example set of support and is not meant to be an exhaustive list of the support, nor is it meant to limit and/or narrow the scope of the claims in any way.

Claim 1	Exemplary Support
A set of at least four storage modules	• Fig. 9: Smart Storage Unit 0, Smart Storage Unit 1, Smart Storage Unit 2, and Smart Storage Unit 3 • Paragraph 0160: "For example, the parity data for the first stripe is stored on device 3 at location 400 and relates to data block 0 stored on device 0 at location 100, data block 1 stored on device 1 at location 200, and data block 2 stored on device 2 at location 300."

Claim 1	Exemplary Support
A file	• Fig. 9: Block 0, Block 1, Block 2, ... • Paragraph 0037: Data blocks for each file may be distributed among a subset of the smart storage units such that data access time is reduced.
A first file portion	• Fig. 9: Block 0 • Paragraph 0160: "For example, the parity data for the first stripe . . . relates to data block 0 stored on device 0. . . . ."
A second file portion	• Fig. 9: Block 1 • Paragraph 0160: "For example, the parity data . . . relates to . . . data block 1 stored on device 1 at location 200. . . ."
Metadata	• Fig. 9: 910 • Paragraph 0034: "Metadata may include any data that relates to and/or describes the file, such as, for example, the location of the file's data blocks, including both device and block location information, the location of redundant copies of the metadata and/or the data blocks (if any) . . . ." • Paragraph 0159: "FIG. 9 illustrates a sample data location table 910 and parity map 920 and the corresponding devices on which the data is stored."
Error correction data	• Fig. 9: Parity 0 • Paragraph 0150: "The metadata may indicate . . . where parity or other error correction information related to the system is stored."

Claim 1	Exemplary Support
A first program module	• Fig. 3: Processing module 330 • Paragraphs 0076-77: "The exemplary processing module 330 may be configured to receive requests for data files, retrieve locally and/or remotely stored metadata about the requested data files, and retrieve the locally and/or remotely stored data blocks of the requested data files. In addition, the processing module 330 may also perform data recovery and error correction in the event that one or more of the requested data blocks is corrupt or lost. In one embodiment, the processing module 330 includes five modules to respond to the file requests, a block allocation manager module 331, a block cache module 333, a local block manager module 335, a remote block manager module 337 and a block device module 339." • Paragraph 0088: "The forward allocator module 110 receives statistics from the other smart storage units . . . and uses those statistics to decide where the best location is to put the new incoming data. The statistics that are gather include, for example, measurements of CPU utilization, network utilization, and disk utilization."
A second program module	• Fig. 3: Processing module 330 • Paragraphs 0076-77: "The exemplary processing module 330 may be configured to receive requests for data files, retrieve locally and/or remotely stored metadata about the requested data files, and retrieve the locally and/or remotely stored data blocks of the requested data files. In addition, the processing module 330 may also perform data recovery and error correction in the event that one or more of the requested data blocks is corrupt or lost. In one embodiment, the processing module 330 includes five modules to respond to the file requests, a block allocation manager module 331, a block cache module 333, a local block manager module 335, a remote block manager module 337 and a block device module 339." • Paragraph 0185: "The parity generation process then . . . records the location of the parity data in a parity map (block 1395). . . ."

b.   Claims 2, 5-10, and 43

Claims 2, 5-10, and 43 depend from amended Claim 1 and include all of the limitations of Claim 1. Applicants respectfully submit that Belsan fails to teach or suggest every element of Claims 2, 5-10, and 43. For example, Claims 2, 5-10, and 43 include "a first program module stored in said distributed file storage system and in communication with the set of storage modules configured to: dynamically select from the set of storage modules a first storage module on which to store the first file portion; dynamically select from the set of storage modules a second storage module on which to store the second file portion, wherein the first storage module is different from the second storage module; dynamically select from the set of storage modules a third storage module on which to store at least a portion of the metadata, wherein the third storage module is different from the first storage module and the second storage module; and dynamically select from the set of storage modules a fourth storage module on which to store the first error correction data, wherein the fourth storage module is different from the first storage module and the second storage module," which is not disclosed in Belsan, as discussed with respect to Claim 1. Thus, Applicants respectfully submit that Claims 2, 5-10, and 43 are patentably distinguished over the cited reference. Applicants respectfully request the Examiner to withdraw the rejection of Claims 2, 5-10, and 43 under 35 U.S.C. § 102(b) and to pass Claims 2, 5-10, and 43 to allowance.

2.   Claims 13-20 and 44-46

a.   Claim 13

Applicants respectfully submit that Belsan fails to teach or suggest every element of amended Claim 13. For example, amended Claim 13 includes "a plurality of storage units configured to: dynamically select where to store blocks of data related to a file among at least two of the plurality of storage units, such dynamic selection based on at least one of performance, available capacity, and throughput of the plurality of storage units," which is not disclosed in Belsan. Thus, Applicants respectfully submit that Claim 13 is patentably distinguished over the cited reference. Applicants respectfully request the Examiner to withdraw the rejection of Claim 13 under 35 U.S.C. § 102(b) and to pass Claim 13 to allowance.

b.   Claims 14-20 and 44-46

Claims 14-20 and 44-46 depend from amended Claim 13 and include all of the limitations of Claim 13. Applicants respectfully submit that Belsan fails to teach or suggest every element of Claims 14-20 and 44-46. For example, Claims 14-20 and 44-46 include "a plurality of storage units configured to: dynamically select where to store blocks of data related to a file among at least two of the plurality of storage units, such dynamic selection based on at least one of performance, available capacity, and throughput of the plurality of storage units," which is not disclosed in Belsan, as discussed with respect to Claim 13. Thus, Applicants respectfully submit that Claims 14-20 and 44-46 are patentably distinguished over the cited reference. Applicants respectfully request the Examiner to withdraw the rejection of Claims 14-20 and 44-46 under 35 U.S.C. § 102(b) and to pass Claims 14-20 and 44-46 to allowance.

3.   Claims 54-56 and 58

a.   Claim 54

Applicants respectfully submit that Belsan fails to teach or suggest every element of amended Claim 54. For example, amended Claim 54 includes "a first module stored on the distributed file storage system configured to dynamically select from among the plurality of storage modules where the portions are to be stored such that the portions are stored among at least two of the plurality of storage modules," which is not disclosed in Belsan. Thus, Applicants respectfully submit that Claim 54 is patentably distinguished over the cited reference. Applicants respectfully request the Examiner to withdraw the rejection of Claim 13 under 35 U.S.C. § 102(b) and to pass Claim 54 to allowance.

b.   Claims 55-56 and 58

Claims 55-56 and 58 depend from amended Claim 54 and include all of the limitations of Claim 54. Applicants respectfully submit that Belsan fails to teach or suggest every element of Claims 55-56 and 58. For example, Claims 55-56 and 58 include "a first module stored on the distributed file system configured to dynamically select from among the plurality of storage modules where the portions are to be stored such that the portions are stored among at least two of the plurality of storage modules," which is not disclosed in Belsan, as discussed with respect to Claim 54. Thus, Applicants respectfully submit that Claims 55-56 and 58 are patentably distinguished over the cited reference. Applicants respectfully request the Examiner to withdraw

the rejection of Claims 55-56 and 58 under 35 U.S.C. § 102(b) and to pass Claims 55-56 and 58 to allowance.

D.   Discussion of Claim Rejections Under 35 U.S.C. § 103

The Office Action rejected Claims 3-4, 11-12, 47-53, and 57 under 35 U.S.C. § 103(a) as being unpatentable over Belsan in view of U.S. Patent No. 6,502,174, issued to Beardsley et al. ("Beardsley"). The Office Action also rejected Claims 11-12 and 47-53 under 35 U.S.C. § 103(a) as being unpatentable over Belsan and Beardsley, and further in view of U.S. Patent No. 5,884,098, issued to Mason, Jr. ("Mason"). The Applicants respectfully traverse these rejections because Belsan, alone or in combination with Beardsley and/or Mason, fails to teach or suggest the elements of the claims. *See* M.P.E.P. § 2143 (stating that in order to establish a *prima facie* case of obviousness for a claim, the prior art references must teach or suggest all the claim limitations).

1.   No Motivation to Combine the References

The Office Action states that with both of the references in front of an ordinary skilled person in the art, "it would have been obvious for an ordinary skilled person in the art at the time the invention was made to be motivated to modify Belsan's system with the metadata structure taught by Beardsley, because by doing so, the combined system would be able to apply the segmented parity information stored in the metadata structure to perform associated storage segment validation or error checking, therefore result [sic] in a faster storage block data recovery in case of system malfunction." In addition, the Office Action states that "it would have been obvious to one of ordinary skilled person in the art at the time the invention was made, to adapt the very popular RAID processing into the combined system of Belsan and Beardsley, because by applying the existing technique of RAID level 5 processing as taught by Mason into the combined system of Belsan and Beardsley, the system would provide a handy read-modify-writ operations for storage data block I/O processing." Thus, it appears that the Office Action has impermissibly used hindsight derived from the teachings in the present application, and not the teachings of the prior art, to reject Claims 3-4, 11-12, 47-53, and 57.

The Applicants submit that the Office Action failed to meet its burden of providing some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the disclosure of Belsan, and combine it with the disclosure of Beardsley and/or Mason. *See* M.P.E.P. § 2143 (stating "To establish a

prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on the Applicants' disclosure.") The Office Action does not show that there was any suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings of Belsan, Beardsley, and/or Mason. Thus, Applicants respectfully request the Examiner to withdraw the rejection of Claims 3-4, 11-12, 47-53, and 57 under 35 U.S.C. § 103(a) and to pass Claims 3-4, 11-12, 47-53, and 57 to allowance.

1.   Claim Rejections Under 35 U.S.C. § 103 in View of Belsan and Beardsley

The Office Action rejected Claims 3-4, 11-12, 47-53, and 57 under 35 U.S.C. § 103(a) as being unpatentable over Belsan in view of Beardsley.   Although Applicants submit that Belsan, alone or in combination with Beardsley, does not disclose each and every element of the rejected claims, Claims 3-4, 11-12, 47, 49, 53, and 57 have been amended without altering their scope in order to clarify the features of the Applicants' inventions. These claim amendments are not made for patentability purposes, and it is believed that the claims would satisfy the statutory requirements for patentability without the entry of such amendments.   Accordingly, Applicants respectfully submit that Belsan, alone or in combination with Beardsley, fails to teach or suggest every element of Claims 3-4, 11-12, 47-53, and 57, and Applicants respectfully request the Examiner to withdraw the rejection of Claims 3-4, 11-12, 47-53, and 57 under 35 U.S.C. § 103(a) and to pass Claims 3-4, 11-12, 47-53, and 57 to allowance.

a.   Claims 3-4

Applicants respectfully submit that Belsan, alone or in combination with Beardsley, fails to teach or suggest every element of Claims 3-4. The Examiner first states that "Belsan discloses all of the features recited in claims 1 and 2."   Claims 2-3 depend from Claim 1 and include all of the limitations of Claim 1. As set forth above, all of the limitations of Claim 1 are not disclosed in Belsan. For example, Claims 3-4 include "a first program module stored in said distributed file storage system and in communication with the set of storage modules configured to:

dynamically select from the set of storage modules a first storage module on which to store the first file portion; dynamically select from the set of storage modules a second storage module on which to store the second file portion, wherein the first storage module is different from the second storage module; dynamically select from the set of storage modules a third storage module on which to store at least a portion of the metadata, wherein the third storage module is different from the first storage module and the second storage module; and dynamically select from the set of storage modules a fourth storage module on which to store the first error correction data, wherein the fourth storage module is different from the first storage module and the second storage module," which is not disclosed in Belsan, as discussed with respect to Claim 1. Thus, Applicants respectfully submit that Claims 3-4 are patentably distinguished over the cited references. Applicants respectfully request the Examiner to withdraw the rejection of Claims 2-3 under 35 U.S.C. § 103(a) and to pass Claims 3-4 to allowance.

b.   Claim 57

Applicants respectfully submit that Belsan, alone or in combination with Beardsley, fails to teach or suggest every element of Claim 57. Claim 57 depends from Claim 54 and includes all of the limitations of Claim 54. As set forth above, all of the limitations of Claim 54 are not disclosed in Belsan. For example, Claim 57 includes "a first module stored on the distributed file storage system configured to dynamically select from among the plurality of storage modules where the portions are to be stored such that the portions are stored among at least two of the plurality of storage modules," which is not disclosed in Belsan, as discussed with respect to Claim 54. Thus, Applicants respectfully submit that Claim 57 is patentably distinguished over the cited references. Applicants respectfully request the Examiner to withdraw the rejection of Claim 57 under 35 U.S.C. § 103(a) and to pass Claim 57 to allowance.

c.   Claims 11-12

Applicants respectfully submit that Belsan, alone or in combination with Beardsley, fails to teach or suggest every element of Claims 11-12. Claims 11-12 depend from Claim 1 and include all of the limitations of Claim 1. As set forth above, all of the limitations of Claim 1 are not disclosed in Belsan. For example, Claims 11-12 include "a first program module stored in said distributed file storage system and in communication with the set of storage modules configured to: dynamically select from the set of storage modules a first storage module on which to store the first file portion; dynamically select from the set of storage modules a second storage

module on which to store the second file portion, wherein the first storage module is different from the second storage module; dynamically select from the set of storage modules a third storage module on which to store at least a portion of the metadata, wherein the third storage module is different from the first storage module and the second storage module; and dynamically select from the set of storage modules a fourth storage module on which to store the first error correction data, wherein the fourth storage module is different from the first storage module and the second storage module," which is not disclosed in Belsan, as discussed with respect to Claim 1. Thus, Applicants respectfully submit that Claims 11-12 are patentably distinguished over the cited references. Applicants respectfully request the Examiner to withdraw the rejection of Claims 11-12 under 35 U.S.C. § 103(a) and to pass Claims 11-12 to allowance.

d.   Claim 47

Although Applicants respectfully submit that Belsan, alone or in combination with Beardsley, fails to teach or suggest every element of Claim 47, Claim 47 has been amended without altering its scope in order to clarify the features of the Applicants' inventions. This claim amendment is not made for patentability purposes, and it is believed that the claim would satisfy the statutory requirements for patentability without the entry of such amendments.

Applicants respectfully submit Belsan, alone or in combination with Beardsley, fails to teach or suggest every element of Claim 47. For example, Claim 47 includes "dynamically selecting from among the plurality of storage modules, a first storage module on which to store a first portion of the file," which is not disclosed in Belsan, alone or in combination with Beardsley. Thus, Applicants respectfully submit that Claim 47 is patentably distinguished over the cited references. Applicants respectfully request the Examiner to withdraw the rejection of Claim 47 under 35 U.S.C. § 103(a) and to pass Claim 47 to allowance.

e.   Claim 48-53

Applicants respectfully submit that Belsan, alone or in combination with Beardsley, fails to teach or suggest every element of Claims 48-53. Claims 48-53 depend from Claim 47 and include all of the limitations of Claim 47. As set forth above, all of the limitations of Claim 47 are not disclosed in Belsan, alone or in combination with Beardsley. For example, Claims 48-53 include "dynamically selecting from among the plurality of storage modules, a first storage module on which to store a first portion of the file," which is not disclosed in Belsan, as

discussed with respect to Claim 47. Thus, Applicants respectfully submit that Claims 48-53 are patentably distinguished over the cited references. Applicants respectfully request the Examiner to withdraw the rejection of Claims 48-53 under 35 U.S.C. § 103(a) and to pass Claims 48-53 to allowance.

2.   **Claim Rejections Under 35 U.S.C. § 103 in View of Belsan, Beardsley, and Mason**

The Office Action also rejected Claims 11-12 and 47-53 under 35 U.S.C. § 103(a) as being unpatentable over Belsan and Beardsley, and further in view Mason. Although Applicants submit that Belsan, alone or in combination with Beardsley and/or Mason, does not disclose each and every element of the rejected claims, Claims 11-12, 47, 49, and 53 have been amended without altering their scope in order to clarify the features of the Applicants' inventions. These claim amendments are not made for patentability purposes, and it is believed that the claims would satisfy the statutory requirements for patentability without the entry of such amendments. Accordingly, Applicants respectfully submit that Belsan, alone or in combination with Beardsley and/or Mason, fails to teach or suggest every element of Claims 11-12 and 47-53, and Applicants respectfully request the Examiner to withdraw the rejection of Claims 11-12 and 47-53 under 35 U.S.C. § 103(a) and to pass Claims 11-12 and 47-53 to allowance.

a.   **Claims 11-12**

Applicants respectfully submit that Belsan, alone or in combination with Beardsley and/or Mason, fails to teach or suggest every element of Claims 11-12. Claims 11-12 depend from Claim 1 and include all of the limitations of Claim 1. As set forth above, all of the limitations of Claim 1 are not disclosed in Belsan. For example, Claims 11-12 include "a first program module stored in said distributed file storage system and in communication with the set of storage modules configured to: dynamically select from the set of storage modules a first storage module on which to store the first file portion; dynamically select from the set of storage modules a second storage module on which to store the second file portion, wherein the first storage module is different from the second storage module; dynamically select from the set of storage modules a third storage module on which to store at least a portion of the metadata, wherein the third storage module is different from the first storage module and the second storage module; and dynamically select from the set of storage modules a fourth storage module on which to store the first error correction data, wherein the fourth storage module is different from the first storage

module and the second storage module," which is not disclosed in Belsan, as discussed with respect to Claim 1. Thus, Applicants respectfully submit that Claims 11-12 are patentably distinguished over the cited references. Applicants respectfully request the Examiner to withdraw the rejection of Claims 11-12 under 35 U.S.C. § 103(a) and to pass Claims 11-12 to allowance.

b.   Claim 47

Applicants respectfully submit that Belsan, alone or in combination with Beardsley and/or Mason, fails to teach or suggest every element of Claim 47. For example, Claim 47 includes "dynamically selecting from among the plurality of storage modules, a first storage module on which to store a first portion of the file," which is not disclosed in Belsan, alone or in combination with Beardsley. Thus, Applicants respectfully submit that Claim 47 is patentably distinguished over the cited references. Applicants respectfully request the Examiner to withdraw the rejection of Claim 47 under 35 U.S.C. § 103(a) and to pass Claim 47 to allowance.

c.   Claim 48-53

Applicants respectfully submit that Belsan, alone or in combination with Beardsley and/or Mason, fails to teach or suggest every element of Claims 48-53. Claims 48-53 depend from Claim 47 and include all of the limitations of Claim 47. As set forth above, all of the limitations of Claim 47 are not disclosed in Belsan, alone or in combination with Beardsley. For example, Claims 48-53 include "dynamically selecting from among the plurality of storage modules, a first storage module on which to store a first portion of the file," which is not disclosed in Belsan, as discussed with respect to Claim 47. Thus, Applicants respectfully submit that Claims 48-53 are patentably distinguished over the cited references. Applicants respectfully request the Examiner to withdraw the rejection of Claims 48-53 under 35 U.S.C. § 103(a) and to pass Claims 48-53 to allowance.

E.   Conclusion

Applicants have endeavored to address all of the Examiner's concerns as expressed in the outstanding Office Action. Accordingly, amendments to the claims, the reasons therefore, and arguments in support of the patentability of the pending claims are presented above. In light of the above amendments and remarks, Applicants specifically request reconsideration and withdrawal of the outstanding objection and rejections. Applicants respectfully request the Examiner to withdraw the objection of Claim 43 and the rejection(s) of Claims 1-20 and 43-58

and to pass Claims 1-20 and 43-58 to allowance. If the Examiner has any questions, Applicants invite the Examiner to call the undersigned directly.

Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

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